



Athens Utilities Board

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T.R.A. DOCKET ROOM

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January 17, 2005

Mr. Glynn Blanton, Chief
Gas Pipeline Safety Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

DOCKET NO.

05-00017

Subject: Athens Utilities Board (AUB) – Tennessee Regulatory Authority (TRA)
Inspection #04-365 – Response to Notice of Violations

Dear Mr. Blanton

Based upon the cover letter included with the subject report, AUB was given three options for response to the incident report. Please consider the attached document as AUB exercising response Option 1 – “submit a written statement to the Pipeline Safety Chief indicating that corrective measures have achieved compliance.”

AUB has evaluated the report and concurs with the findings of the TRA. The incident of July 16, 2004 had tragic repercussions for all parties involved, but especially the young man who was severely burned in the incident.

After a very thorough investigation of the event, we have taken a number of appropriate actions based upon the findings of our internal investigation. These actions were designed to evaluate the effectiveness of our current locator staff and processes, to improve those functions where applicable, and to definitively reassert the importance of personal responsibility in executing assigned job duties per established procedures.

If you have any questions or comments regarding the attachments or enclosures, or if I can be of any further assistance to you, please feel free to call me at (423) 745-4501.

Yours truly,

ATHENS UTILITIES BOARD

Eric T. Newberry, Jr.
General Manager

Page Two
Mr Glynn Blanton, Chief
January 17, 2005

Attachment – Athens Utilities Board Response to Notice of Violations

Cc Mr Charles J. “Buddy” Liner, AUB Board Chairman
 Attorney David Harrod, AUB Legal Representative
 Mr Bob Ingram, AUB Superintendent of Gas
 Ms Sherree Reed, AUB Gas Division

**Athens Utilities Board
Response to Notice of Violations
Natural Gas Safety Inspection #04-365**

Official Written Statement Response to Inspection #04-365

Introduction:

The event of Friday July 16th, 2004 was a tragic event for all individual's involved, particularly for the young man who received the burns to his arms and torso. AUB management began evaluating the incident immediately upon arrival to determine exactly what had transpired and if possible how to prevent such an incident from occurring in the future. The immediate site investigation left members of our management team with some troubling issues that required further investigation in order to evaluate any and all extenuating circumstances. This included the evaluation of all records that might have been associated with any aspect of the event. By Monday July 19th, 2004 all associated records (timesheets, one-call tickets, one-call tracking sheets, dispatch logs, etc) had been pulled and evaluated. Based upon these records, observations at the incident site, and discussions with involved personnel, there was a failure of AUB personnel to perform their job duties as assigned regarding the Tennessee One-Call locate system.

Immediate Corrective Actions:

At approximately 3 50 P M. after completing a briefing with the eye-witness and senior gas division personnel there was an immediate issue raised with not only the potential accuracy, but the actual performance of our one-call locates. The following actions were taken immediately:

1. Pulled all one-call tickets
2. Determined all one-call tickets currently "active"
3. Identified all tickets marked N I (Not Involved) by locators
4. Relocated all tickets – priority given to all tickets marked N I (Not involved) by involved employee
5. Re-stressed the importance of proper work execution with all employees not just locators

Upon review of all the associated documents (Monday July 17th (evening), it was obvious that there was a failure by specific AUB personnel to properly execute their job in locating the intersection per the one-call instructions. In fact the second one-call ticket was marked as N I (Not Involved) by the locator. After looking for potential extenuating circumstances from the dispatch logs and interviewing the subject employee there was

obvious dereliction of duty The following actions were taken on Monday July 17th with regard to the subject employee

1. Final review of all associated documents including dispatch logs and timesheets
2. Completed interview with involved employee
3. Termination of employee based upon admission of dereliction of duty

Long Term Corrective Actions:

Because of the severity of the incident (actual injury to the public) and the fact that there could have been loss of human life the following actions were deemed essential in order to minimize the potential for a similar incident in the future

1. Re-stress the importance of daily work execution with all AUB personnel.
2. Focus on the fact that dereliction of duty is unacceptable in any of our operations, but especially those that have the potential to result in harm to human health and the environment. Stress that appropriate actions will be taken in the event of dereliction of duty.
3. Re-assess the locator position and associated duties
4. Evaluate hiring a full-time locator charged specifically with the job and allowing the gas apprentices to assist or fill-in during vacation
5. Provide documentation of the procedure for locating and re-train all individuals that are involved in the process
6. Provide job specific requirements above those required by procedure to ensure that work is being conducted in an effective manner to protect the public's safety

Conclusion:

As stated earlier, the incident of July 16th, 2004 was unfortunate and tragic for all parties involved. Significant progress has been made by AUB in relationship to the corrective actions that have been taken. We have completed the re-assessment of the locator's position including a new job description and have hired a permanent full-time locator responsible for all aspects of the one-call process. AUB is currently evaluating the work load associated with the current position and evaluating whether it would be necessary to add another full-time locator position based upon work-load. The job specific requirements that we have placed above and beyond the procedural requirements have provided a consistent approach to one-call locates that has helped us better evaluate the performance of our work. Lastly, we concur with the findings of the Tennessee Regulatory Authority (TRA) in their incident report and are working diligently every day to minimize the potential for any future incidents that might have their root cause associated with AUB procedures or our personnel's work performance. Pursuant to the recommendations contained in the incident report, upon the TRA approval of this Plan of Action, AUB will transmit a check in the amount of \$15,000.00 payable to the TRA.